

DICKINSON WRIGHT PLLC

John L. Krieger, Esq., Nevada Bar No. 6023
Kevin D. Everage, Esq., Nevada Bar No. 15913
Brady A. Bathke, Esq., Nevada Bar No. 16191
3883 Howard Hughes Parkway, Suite 800
Las Vegas, Nevada 89169
Telephone (702) 550-4400
Facsimile (844) 670-6009
Email: jkrieger@dickinson-wright.com
Email: keverage@dickinson-wright.com
Email: bbathke@dickinson-wright.com

AMERICAN CIVIL LIBERTIES UNION OF NEVADA

Christopher Peterson, Esq., Nevada Bar No. 13932
Jacob Smith, Esq., Nevada Bar No. 16324
4362 W. Cheyenne Ave.
North Las Vegas, Nevada 89032
Telephone (702) 366-1226
Email: peterson@aclunv.org
Email: jsmith@aclunv.org

NATIONAL ASSOCIATION OF THE DEAF

Brittany Shrader (Admitted *pro hac vice*)
8630 Fenton Street, Suite 820
Silver Spring, MD 20910
Phone: (301) 587-2907
brittany.shrader@nad.org

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTOPHER JONES,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a municipal corporation,

Defendant.

Case No: 2:24-cv-00090-ART-MDC

**JOINT STIPULATION TO EXTEND
ALL DEADLINES
(FIRST REQUEST)**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

Plaintiff Christopher Jones (“Plaintiff” or “Jones”) and Defendant Las Vegas Metropolitan

Police Department (“Defendant” or “LVMPD”) (collectively the “Parties”), by and through their respective counsel of record, hereby respectfully submit this Joint Stipulation to Extend all deadlines by an additional sixty (60) days. This is the first request to extend deadlines in this matter. The Parties have agreed to the extension for the reasons set forth below:

PROCEDURAL BACKGROUND

Plaintiff filed his Complaint in this case on January 11, 2024. (ECF No. 1.) LVMPD filed their Answer on February 12, 2024. (ECF No. 8.)

On March 15, 2024, the Court entered an order granting the Discovery Plan and Scheduling Order. (ECF No. 12). Since that time, the parties exchanged Initial Disclosures.

GOOD CAUSE TO EXTEND DISCOVERY

Both parties are actively engaging in discovery and will continue to do so to ensure that relevant information is obtained and exchanged in a timely manner.

The Parties have stipulated and agreed to extend all deadlines by an additional sixty (60) days as set forth below. In addition to following up on documentation produced, Plaintiff’s primary counsel, Christopher Peterson, is currently on parental leave until mid-July 2024, and seeks accommodation for his absence. This extension will ensure that the case continues to progress smoothly, and to allow both sides to address issues that may arise between them. For these reasons, this stipulation is made for good cause and not for any improper motive or to cause unnecessary delay.

The Parties hereby stipulate and agree to the following proposed deadlines in this case:

Event	Existing Deadline	Proposed New Deadline
Last day to Amend Pleadings	May 28, 2024	July 29, 2024
Expert Disclosures (for party with the burden of proof on the issue)	June 27, 2024	August 26, 2024
Rebuttal Expert Disclosures	July 29, 2024	September 27, 2024
Discovery Cutoff	August 26, 2024	October 25, 2024
Dispositive Motion Deadline	September 25, 2024	November 25, 2024

Joint Proposed Pretrial Order	October 25, 2024	December 24, 2024
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If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED this 28th day of May, 2024.

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KAEMPFER CROWELL

/s/ John L. Krieger

/s/ Lyssa A. Anderson

John L. Krieger, Esq.

Lyssa S. Anderson, Esq.

Kevin D. Everage, Esq.

Kristopher Kalkowski, Esq.

Brady A. Bathke, Esq.

1980 Festival Plaza Drive, Suite 650

3883 Howard Hughes Parkway, Suite 800

Las Vegas, Nevada 89135

Las Vegas, Nevada 89169-0965

*Attorneys for Defendant Las Vegas Metropolitan
Police Department.*

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Christopher Peterson, Esq.

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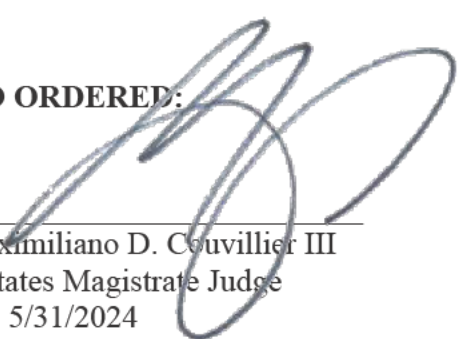
(Admitted *Pro hac vice*)

8630 Fenton Street, Suite 820

Silver Spring, Maryland 20910

Attorneys for Plaintiff Christopher Jones

IT IS SO ORDERED:



Hon. Maximiliano D. Couvillier III

United States Magistrate Judge

DATED: 5/31/2024